

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	and the second s
)	1 ° 10 CD ZEO
v.)	CASE NO. 19 CR 350
∞)	Title 21, United States Code,
COREY BROWN,)	Sections $841(a)(1)$, $(b)(1)(A)$, (B)
)	and 846
Defendant.)	HINGE BOYKO
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COUNT 1

(Conspiracy to Manufacture, Distribute, and Possess with Intent to Distribute Controlled Substances, 21 U.S.C. §§ 841 (a)(1), (b)(1)(A), (B) and 846)

The Grand Jury charges:

1. From on or about June 12, 2017, to on or about September 11, 2017, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant COREY BROWN, Devon Williams, Marquacia Deshawn Morris (charged previously), and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with diverse others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute 2214 grams of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, and 1974.3 grams of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and (B).

MANNER AND MEANS OF THE CONSPIRACY

- 2. It was part of the conspiracy that:
- A. COREY BROWN shipped cocaine and methamphetamine in parcels via the U.S. Mail.
- B. Marquacia Deshawn Morris accepted, diverted, and distributed in the Northern District of Ohio the drug parcels mailed by COREY BROWN.
- C. Devon Williams accepted and transported in the Northern District of Ohio the drug parcels mailed by COREY BROWN.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance thereof, and to effect and conceal the existence of the conspiracy, the defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

- 3. On or about June 12, 2017, at approximately 3:21 p.m. PST, COREY BROWN mailed a package ("Package 1") containing 1974.3 grams of cocaine, its salts, optical and geometric isomers, and salts of its isomers, from Gardena, California, to Cleveland, Ohio.

 Package 1 was intercepted by federal law enforcement and was not delivered.
- 4. On or about September 7, 2017, at approximately 1:35 p.m. PST, COREY BROWN caused an unknown co-conspirator to mail a second package ("Package 2"), containing 2214 grams of methamphetamine, its salts, isomers, and salts of its isomers, from Los Angeles, California, to Beachwood, Ohio.

- 5. On or about the morning of September 11, 2017, Marquacia Deshawn Morris, who was a United States Postal Service Letter Carrier, accepted the package of methamphetamine and began her assigned daily mail delivery route.
- 6. On or about September 11, 2017, at approximately 1:46 p.m. EST, Marquacia Deshawn Morris, diverted from her assigned daily mail delivery route and travelled with the package of methamphetamine to 27020 Cedar Road, Beachwood, Ohio.
- 7. On or about September 11, 2017, at approximately 1:46 p.m. EST, Devon Williams met Marquacia Deshawn Morris at 27020 Cedar Road, Beachwood, Ohio, where he accepted the package of methamphetamine from her and transported it to 440 Richmond Park East, Richmond Heights, Ohio.

All in violation of Title 21, United States Code, Section 846.

FORFEITURE

The Grand Jury further charges:

8. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegation of Count 1 is incorporated herein by reference. As a result of the foregoing offense, Defendant COREY BROWN shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violation; and any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.